



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP/AS  
F. #2021R00600

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 23, 2025

By Email and ECF

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Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation:

<b>Bates No.</b>	<b>Description of Item</b>
EDNY_136032-EDNY_136036	Translated records from a Silver MacBook Pro with Serial Number C02T89XXGTFL that was Seized at the Sun and Hu Residence. Original records were previously produced as EDNY_135617
EDNY_136037-EDNY_136046	Records from the New York State Executive Chamber
EDNY_136047	Responsive material from a Silver MacBook Pro with Serial Number C02T89XXGTFL that was Seized at the Sun and Hu Residence
EDNY_136048-EDNY_136084	Final translations of responsive chats from Linda Sun's iCloud, produced in draft summary form as EDNY_134106-EDNY_134638
EDNY_136085-EDNY_136087	Responsive chats from a Silver MacBook Pro with Serial Number C02T89XXGTFL that was Seized at the Sun and Hu Residence
EDNY_136088-EDNY_136114	Search Warrant and Affidavit dated May 23, 2025 (25-MC-2082)

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney  
Eastern District of New York

By: /s/ Alexander A. Solomon  
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